

# State of Tennessee

## In the Circuit Court of Hamilton County

Rayneika Hunter and Jon-Isaac Malone  
Plaintiff

No. 24C 1060

Alan Gold's Discotheque and CPD  
Defendant

Served  
10/11/2024 on  
Court Liaison  
FILED IN OFFICE  
2024 OCT -8 PM 1:40  
LARRY L. HENRY, CLERK  
BY GBN DC

## SUMMONS

TO: Alan Gold's Discotheque 1100 McCallie Ave  
Defendant Address  
[02] Chattanooga Police Department 3410 Annicola Hwy ★  
Defendant Address Chatt, TN. 37406  
Defendant Address

You are hereby summoned to answer and make defense to a bill of complaint which has been filed in the Circuit Court of Hamilton County, Tennessee in the above styled case. Your defense to this complaint must be filed in the office of the Circuit Court Clerk of Hamilton County, Tennessee on or before thirty (30) days after service of this summons upon you. If you fail to do so, judgement by default will be taken against you for the relief demanded in the complaint.

WITNESSED and Issued this 8<sup>th</sup> day of October, 2024

CIRCUIT COURT OF HAMILTON COUNTY  
500 COURTHOUSE  
625 GEORGIA AVENUE  
CHATTANOOGA, TENNESSEE 37402  
423/209-6700

Larry L. Henry, Circuit Court Clerk  
By H. Markov  
Deputy Circuit Court Clerk

Attorneys for Plaintiff \_\_\_\_\_

Address \_\_\_\_\_

Plaintiff's Address \_\_\_\_\_

Received this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

/S/ \_\_\_\_\_

Deputy Sheriff



# CIVIL CASE COVER SHEET

24C1060

Check one: ☐ CHANCERY COURT ☒ CIRCUIT COURT Docket NO. \_\_\_\_\_

Date 10-7-24 Attorney of Record \_\_\_\_\_

I. Origin ☒ Original Proceeding ☐ Case Reopened ☐ Counter-Claim ☐ Cross-Claim ☐ 3rd Party Claim ☐ Intervening Claim  
☐ Answer/Initial Responsive Pleading ☐ Other (Specify) \_\_\_\_\_

## II. Type of Action (Check one)

### Domestic Relations

☐ 361 Paternity ☐ 362 Legitimation  
☐ 371 Divorce with minor children ☐ 372 Divorce without minor children  
☐ 383 Residential Parenting ☐ 384 Residential Parenting  
☐ /no child support ☐ /child support

☐ 363 Adoption ☐ 364 Surrender  
☐ 381 Order of protection ☐ 391 Interstate Support-Incoming  
☐ 385 Child Support ☐ 387 Wage Assignment  
☐ 392 Interstate Support-Outgoing Hearing

☐ 401 Other Domestic Relations (Specify) \_\_\_\_\_

General Sessions Appeal (check box if case is appealed or transferred from General Sessions Court) ☐ Yes

### General Civil

☐ 451 Medical Malpractice ☐ 461 Contract/Debt  
☐ 481 Real Estate Matter ☐ 491 Workers Compensation  
☐ 513 Appeal from Admin. Hearing ☐ 571 Conservatorship

☐ 462 Specific Performance ☒ 471 Damages/Torts  
☐ 501 Probate ☐ 511 Juvenile Court Appeal  
☐ 572 Guardianship ☐ 573 Trust

☐ 581 Miscellaneous General Civil (Specify) \_\_\_\_\_

### Other

☐ 541 Judicial Hospitalization ☐ 382 Contempt

Petition for: (Reopened Cases)

☐ 384 Residential Parenting/Child Support ☐ 381 Order of Protection

☐ 501 Probate ☐ 385 Child Support

☐ 573 Trust ☐ 541 Judicial Hospitalization

☐ 551 Other

☐ 382 Contempt ☐ 383 Residential Parenting/No Child Support  
☐ 387 Wage Assignment Hearing  
☐ 571 Conservatorship ☐ 572 Guardianship

III. Total amount sued for \$ 700,000.00 Specific type of damages or relief sought compensatory, punitive, economic non-economic

Statutory authority for suit, if any \_\_\_\_\_

IV. Check one: ☒ Affidavit to proceed in forma pauperis ☐ Cost Bond Surety

V. JURY DEMAND (Check YES only if demand in complaint) ☐ YES ☒ NO

VI. RELATED CASES (if any) Docket NO. \_\_\_\_\_ Judge \_\_\_\_\_  
 Date filed \_\_\_\_\_ Status \_\_\_\_\_

## VII. PLAINTIFF/PETITIONER INFORMATION (Listed additional parties on supplemental form.)

1. Name Hunter Last Rayneika First D Middle

DOB 11-02-1991 Social Security # XXX-XX-3992

COMPANY NAME 1206 Glenwood Drive  
 ADDRESS Chattanooga, TN 37406  
 CITY STATE ZIP  
 EMPLOYER \_\_\_\_\_

ADDRESS \_\_\_\_\_  
 CITY STATE ZIP

ATTORNEY \_\_\_\_\_ BPR# \_\_\_\_\_  
 ADDRESS \_\_\_\_\_  
 CITY (404) 423-6818 STATE ZIP  
 PHONE \_\_\_\_\_

## VIII. DEFENDANT/RESPONDENT INFORMATION (List additional parties on supplemental form)

1. Name \_\_\_\_\_ Last \_\_\_\_\_ First \_\_\_\_\_ Middle \_\_\_\_\_

☐ AKA ☒ DBA ☐ BNF Alan Gold's Discotheque

DOB \_\_\_\_\_ Social Security # XXX-XX-

Alan Gold's Discotheque

COMPANY NAME 1100 McCallie Ave  
 ADDRESS Chattanooga TN 37404  
 CITY STATE ZIP  
 EMPLOYER \_\_\_\_\_

ADDRESS \_\_\_\_\_  
 CITY STATE ZIP

ATTORNEY \_\_\_\_\_ BPR# \_\_\_\_\_  
 ADDRESS \_\_\_\_\_  
 CITY 423-629-8080 STATE ZIP  
 PHONE \_\_\_\_\_

## TYPE OF SERVICE REQUIRED

☐ Out of County Sheriff ☐ Publication (Specify) \_\_\_\_\_  
☒ Local Sheriff ☐ Other (Specify) \_\_\_\_\_  
☐ Secretary of State Special Instructions \_\_\_\_\_  
☐ Comm. of Ins. \_\_\_\_\_

## IX. ASSOCIATED PARTY (Uninsured Motorist Carrier) INFORMATION

1. Name \_\_\_\_\_ Address \_\_\_\_\_

Type of Service (specify) \_\_\_\_\_

Are additional plaintiffs or defendants listed on a separate sheet? ☐ YES ☐ NO

**SUPPLEMENTAL  
CIVIL CASE COVER SHEET  
ADDITIONAL PARTIES INFORMATION**

DOCKET NO. 24C1060

Check One:

- ☒ Plaintiff/Petitioner  
☐ Defendant/Respondent  
☐ Associated Party

1. Name

Malone

Jim-Isaac

D

LAST

FIRST

MIDDLE

☐ AKA ☐ DBA ☐ BNF

S.S. # XXX-VX-6549

DOB

3-26-1992

Drivers License #

115398784

COMPANY NAME

4206 Linton Ave

ADDRESS

Chattanooga

TN

37416

CITY

STATE

ZIP

EMPLOYER

ADDRESS

CITY

STATE

ZIP

TYPE OF SERVICE REQUIRED (Check One)

- ☐ Out Of County Sheriff  
☒ Local Sheriff  
☐ Secretary Of State  
☐ Comm. Of Ins.

ATTORNEY

ADDRESS

CITY

STATE

ZIP

PHONE

BOARD OF PROFESSIONAL RESPONSIBILITY #

☐ Publication (specify)

☐ Other

Special Instructions

Check One:

- ☐ Plaintiff/Petitioner  
☐ Defendant/Respondent  
☐ Associated Party

1. Name

Chattanooga

Police Department

MIDDLE

☐ AKA ☒ DBA ☐ BNF

S.S. #

DOB

Drivers License #

COMPANY NAME

3410 Annicola Hwy

ADDRESS

Chattanooga, TN

37406

CITY

STATE

ZIP

EMPLOYER

3410 Annicola Hwy

ADDRESS

Chattanooga, TN

37406

CITY

STATE

ZIP

TYPE OF SERVICE REQUIRED (Check One)

- ☐ Out Of County Sheriff  
☒ Local Sheriff  
☐ Secretary Of State  
☐ Comm. Of Ins.

ATTORNEY

ADDRESS

CITY

STATE

ZIP

PHONE

BOARD OF PROFESSIONAL RESPONSIBILITY #

☐ Publication (specify)

☐ Other

Special Instructions

Check One:

- ☐ Plaintiff/Petitioner  
☐ Defendant/Respondent  
☐ Associated Party

1. Name

LAST

FIRST

MIDDLE

☐ AKA ☐ DBA ☐ BNF

S.S. #

DOB

Drivers License #

COMPANY NAME

ADDRESS

CITY

STATE

ZIP

EMPLOYER

ADDRESS

CITY

STATE

ZIP

TYPE OF SERVICE REQUIRED (Check One)

- ☐ Out Of County Sheriff  
☐ Local Sheriff  
☐ Secretary Of State  
☐ Comm. Of Ins.

ATTORNEY

ADDRESS

CITY

STATE

ZIP

PHONE

BOARD OF PROFESSIONAL RESPONSIBILITY #

☐ Publication (specify)

☐ Other

Special Instructions



RAYNEIKA HUNTER and  
JON-ISAAC MALONE

Plaintiffs

vs.

ALAN GOLD'S DISCOTHEQUE and  
CHATTANOOGA POLICE DEPARTMENT

Defendants

Case No.

Division

FILED IN OFFICE  
2024 OCT -8 PM 1:43  
LARRY L. HENRY, CLERK  
BY LHBN DC

COMPLAINT

A lawsuit has been commenced against Alan Gold's Discotheque and Chattanooga Police Department by Plaintiffs, Rayneika Hunter and Jon-Isaac Malone. Plaintiffs are filing several claims under gross negligence, harassment, emotional distress, violating Constitutional Rights, violating Civil Rights, systemic racial inequality, slander, unlawful detention, unlawful imprisonment, pain and suffering, and Plaintiffs are seeking relief.

Defendants, Alan Gold's Discotheque and Chattanooga Police Department are liable for their employees' actions. The facts are that the manager of Alan Gold's on scene, Deborah Denise Willford's egregious behavior resulted in harassment, multiple assaults, damage of property, and false malicious reporting about Plaintiffs' attacking her to the Chattanooga Police Department. The facts are that officers from the Chattanooga Police Department showed a reckless disregard for the whole truth under gross negligent behavior, police misconduct, systemically excluding Plaintiffs' statements and witnesses statements on scene that was in coordination with Plaintiffs' statements of being racially discriminated against, harassed, antagonized, and attacked physically by Alan Gold's employee(s).

The facts are Ms. Williford exited the comfort of Alan Gold's Discotheque establishment alone, without security, onto the sidewalk to charge 50-feet aggressively down the street onto public property to approach Plaintiff, Mr. Malone. During that time, Ms. Williford intentionally harassed (with threatening gestures) both Plaintiffs and proceeded to physically assault Plaintiff, Ms. Hunter multiple times with her massive stature *T.C.A. § 39-17-309 (2021)* and *has video of all claims and encounters*.

No one from Defendant, Alan Gold's security team attempted to stop or deescalate the situation which caused Ms. Williford's erratic behavior to continue, causing the Plaintiffs severe emotional distress in the process. Plaintiff, Ms. Hunter attempted to verbally defuse Ms. Williford's continued aggression, but Ms. Williford continued the harassment on-foot, crossing public sidewalks and streets approximately 150-feet away from the entrance of Alan Gold's Discotheque. **Plaintiffs have video of these claims and encounters.**

Ms Williford continued her gross negligent behavior by antagonizing, physically assaulting, and knowingly grabbing the Plaintiff, Ms. Hunter's cellular phone, throwing it 10-feet away, ultimately damaging plaintiff's Apple iPhone 13 Pro T.C.A § 39-14-408 (2021) and breaking two fingernails. **Plaintiff, Ms. Hunter has videos of all claims and encounters.** Witnesses listed in *Chattanooga Police Affidavit Report Number 23-109072* video recorded Ms. Williford's egregious behavior along with the witnesses' video narrative (on scene) of the attacks made by Ms. Williford. During the time of witness video recording, and by Ms. Williford's own admission, didn't deny the harassment, assault, and vandalism made against Plaintiff, Ms. Hunter. Plaintiff, Mr. Malone was assaulted, injured, and wrongfully detained by Alan Gold's security soon afterwards.

Chattanooga Police Department then received a false report directly to officer's phone made by Ms. Williford of claims that she was being attacked stated in *Chattanooga Police Report #23-109072*. Upon CPD officer arriving to the scene, Plaintiff, Ms. Hunter (immediately and repeatedly) stated that Ms. Williford intentionally and recklessly antagonized both Plaintiffs, continually physically attacked, and intentionally damaged Plaintiff, Ms. Hunter's property. **Plaintiff, Ms. Hunter has video of these claims and encounters and is ready to view them in court.**

Plaintiff, Ms. Hunter was then questioned by the CPD officer called on the scene directly by Ms. Williford. Plaintiff, Ms. Hunter gave her statement and attempted to show the CPD officer video evidence of the attacks made by Ms. Williford, but was denied that liberty, violating Plaintiff, Ms. Hunter's First Amendment Rights, Constitutional Rights, and Civil Rights, and possessed actions of gross negligence and police misconduct. (Tennessee Code §39-16-403)

During the time of questioning all parties involved, additional CPD officers arrived on scene to gather several witness statements that coincided and confirmed Plaintiffs' Ms. Hunter and Mr. Malone statements of being harassed, discriminated against, and physically attacked by Ms. Williford in *Chattanooga Police Report*

During questioning on the scene, CPD had a Duty of Care, which is a legal obligation and standard care to take reasonable steps to not cause foreseeable careless harm and/or to avoid wrongful imprisonment. Three (3) witnesses listed in *Chattanooga Police Report Affidavit Number 23-109072* verified Plaintiffs statements. Allegations were then made by Ms. Williford of being attacked without proof and without witness statements confirming her story were immediately accepted and Plaintiffs, Ms. Hunter and Mr. Malone were placed under arrest in handcuffs. ***Plaintiff, Ms. Hunter has video of witnesses statements to the CPD on scene. Plaintiff has video of claims and encounters and is ready to view them in court.***

Facts are that with reckless disregard for the whole truth and by not allowing Ms. Hunter to show videos of Ms. Williford's egregious behavior to press criminal charges, violated several of Ms. Hunter's and Mr. Malone's rights, causing an obstruction of justice. Chattanooga Police Department (CPD) transported both Plaintiffs to Hamilton County Jail to be charged with allegations of assault, causing severe traumatic emotional distress in the process.

#### LAW

There's no dispute that Plaintiff, Ms. Hunter, was arrested for an *Assault* charge under the false allegations of being "attacked", but was later ***dismissed***.

#### COMPENSATION

Plaintiff, Ms. Hunter asks for this Honorable Court's decision to grant the plaintiff compensatory, punitive, economical, and non-economical damage relief based on the pleadings.

- Unlawful Imprisonment of Ms. Hunter \$100,000
- Unlawful Imprisonment of Mr. Malone \$100,000
- Involuntary Detainment of Ms. Hunter by CPD \$100,000
- Involuntary Detainment of Mr. Malone by Alan Gold's \$100,000
- Emotional Distress of Ms. Hunter \$100,000
- Emotional Distress of Mr. Malone \$100,000
- Gross Negligence of Ms. Hunter \$100,000
- Gross Negligence of Mr. Malone \$100,000

#### FEES

Defendant pays Plaintiffs' court costs and all attorneys' fees are to be ordered against the defendant.

*Payneka Hunter*

*Jon - Isaac Malone*



SPN 547871	Date Arrested 10/7/2023	Time Arrested 2:29 AM	Arrestee # 2	Sector / District B South	Warrant Signed By <input checked="" type="checkbox"/> Officer <input type="checkbox"/> Victim <input type="checkbox"/> Both	<input checked="" type="checkbox"/> Original Charge <input type="checkbox"/> Warrant Service
Location Of Arrest 1100 MCCALLIE AVE			Location Of Incident (If different from arrest) 1100 MCCALLIE AVE			CPD Number
ARRESTING AGENCY	Arresting Agency Name CHATTANOOGA POLICE DE	Arresting ORI TN 0330100	Arresting Agency ID Num 2	Jail/Arrest Number	Arresting Complaint Number 23-109072	
REPORTING AGENCY	Reporting Agency Name CHATTANOOGA POLICE DE	Reporting ORI TN 0330100	Reporting Agency ID 2	T.B.I. Document#	Reporting Complaint Num	
ARRESTEE	(Office Only) Last Name MALONE, JON ISACC	First Name	Middle Name	Alias/Maiden/Nickname		
Last name	First Name	Middle Name	Age 31	Sex M	Race B	Date Of Birth 3/26/1992
			Ethnicity N	Resident Status Non-Resident	Under Age 18	
Height 510	Weight 230	Hair Blac	Eyes Bro	Marka, Scars, Tattoos, Physical Defects	Social Security Number 610-70-6543	Driver License/ID Number 115398784
Home Address 4206 LINTON AVE			City CHATTANOOGA	State TN	Zip 374163407	Business Name/Address
Home Phone		Place Of Birth	FBI or S.I.D. Number	Business Phone	Type Of Arrest O	Multiple Clearance Cleared
Armed with: Describe weapon (serial#)			Make	Model	Caliber	Armed with: Describe weapon (serial#)
Code: auto						Code: auto
Offense	TIBRS	Status	Def Used	Location	Criminal Activity	Bias
						Gang: Activity
						Type
						Name
#	Suspected Drug Type		Estimated Qty	Measurement		
1						
2						
3						
IF MARIJUANA COMPLETE THE FOLLOWING						
<input type="checkbox"/> Indoor <input type="checkbox"/> Outdoor <input type="checkbox"/> Both						
Num Of Plots						Latitude
						longitude
Property Or Evidence Description:						Receipt Number
CODE: C-Complaint V-Victim W-Witness P-Parent G-Guardian Obtain information from warrant if available						
Code	Last Name	First Name	Mid	DOB	Age	Sex
V	COLEMAN	ROBERT		8/5/1990	33	M
W	RHODES	VENITA		3/7/1991	32	F
						Race
						Home or Business Address
						Phone Number
VEHICLE: YR	Make	Model	Style	Color(s)	License	State
						TN
VIN			Vehicle can be located at:			
			<input type="checkbox"/> Parked and Locked <input type="checkbox"/> Towed			

CHARGE	DOCKET #	CHARGE	DOCKET #	CHARGE	DOCKET #
ASSAULT	1925934	ASSAULT	1925955		

# AFFIDAVIT OF COMPLAINT In the General Sessions Court of Hamilton State of Tennessee vs. MALONE, JON ISAAC D

The undersigned affiant, after being duly sworn according to the law MALONE, JON ISAAC D whose name is otherwise unknown to the affiant, committed the offense of ASSAULT In the above county at (Location) on or about 10/7/2023 Further, affiant makes oath that the essential facts constituting said offense, the sources of affiant's information, and the reasons why his/her information is believable concerning said facts are as follows:

OWNER LIED ABOUT BEING SPIT ON AND THAT THE OWNER HAD GRABBED A PERSON'S PHONE OUT OF THEIR HAND THROWING IT. DANNY JACKSON, A FRIEND OF MR. MALONE, ADVISED THAT MR. MALONE WAS THROUWED AND RACIALLY DISCRIMINATED AGAINST. VENITA RHODES REPORTED THAT THEY WERE LEAVING ALAN'S GOLF AND DE-ESCALATING THE SITUATION. MS. RHODES REPORTED THAT THE OWNER CAME OUT TO ANTAGONIZE MR. MALONE. MS. RHODES REPORTED THAT THERE WAS NO MENTION OF ESCORTING THEM BACK TO THE CAR BUT THAT THE MANAGER CONTINUED TO BE AGGRESSIVE AND YELLING INSULTS. MS. RHODES REPORTED THAT MS. HUNTER WAS SPEAKING WITH THE OWNER WHEN MS. HUNTER WAS CALLED A "BITCH" BY THE OWNER AND THAT OWNER HAD GRABBED MS. HUNTER'S PHONE, THROWING IT ABOUT THREE FEET. MS. RHODES REPORTED THAT THE OWNER HAD ASSAULTED MS. HUNTER AND THAT NO SALIVA WAS EXCHANGED. MR. MALONE MADE STATEMENTS THAT HE DID NOT KNOW THAT HE WAS TRESPASSING FROM THE LOCATION. MS. HUNTER MADE STATEMENTS THAT SHE WOULD BE HIRING A LAWYER AND THAT THE POLICE HAD NOT LISTENED TO HER STATEMENT AND CHOSE TO SIDE WITH MS. WILLIFORD. I PLACED MR. MALONE IN - CONT. NEXT PAGE

If the defendant's charge is dismissed, a no true bill is returned by a grand jury, the defendant is arrested and released without being charged with an offense, or the court enters a nolle prosequi in the defendant's case, the defendant is entitled, upon petition by the defendant to the court having jurisdiction over the action, to the removal and destruction of all public records relating to the case without cost to the defendant.

IO-Defendants: HUNTER, RAYNEKA D



Signature Arresting Officer/Affiant DA 1178	Badge # 1178
Signature Approving Supervisor	Badge #
NCIC/YES Entries/Clear	Date
Made By:	

Sworn to before me this 10/7/2023

Judge-Court Of General Sessions  
Vince Dean, Clerk, Criminal Div.  
General Sessions Court

By: DA Ramsey

Court Clerk/Deputy Clerk

Arresting Officer: AULA, J 1178



IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE

RAYNEIKA HUNTER and  
JON-ISAAC MALONE,

Plaintiffs,

v.

ALAN GOLD'S DISCOTHEQUE and  
CHATTANOOGA POLICE  
DEPARTMENT,

Defendants.

Docket No. 24C1060

Division III

FILED IN OFFICE  
2024 OCT 24 PM 2:24  
LARRY L. HENRY, CLERK  
BY: MM DC

NOTICE OF APPEARANCE

Please take notice that Kathryn McDonald (BPR No. 30950), Azarius Yanez (BPR No. 36266), and Phillip A. Noblett (BPR No. 10074) do hereby appear on behalf of the defendant, Chattanooga Police Department in the above-captioned action before the Circuit Court of Hamilton County, Tennessee.

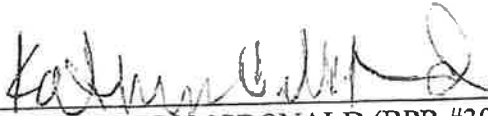
These attorneys are duly qualified to act as such under the laws of the State of Tennessee and are authorized to appear as such in proceedings before the Circuit Court of Hamilton County, Tennessee, under its rules of practice and procedure.



Respectfully submitted,

OFFICE OF THE CITY ATTORNEY  
CITY OF CHATTANOOGA, TENNESSEE

By:



KATHRYN MCDONALD (BPR #30950)

AZARIUS YANEZ (BPR #36266)

*Assistant City Attorneys*

PHILLIP A. NOBLETT (BPR #10074)

*City Attorney*

100 E. 11th Street, Suite 200

Chattanooga, TN 37402

(423) 643-8250 (telephone)

(423) 643-8255 (facsimile)

*Attorneys for the Chattanooga Police Department*

**CERTIFICATE OF SERVICE**

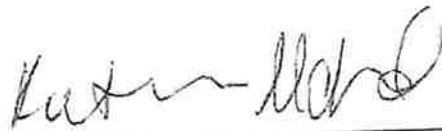
This is to certify that the undersigned has this day served a true and correct copy of the foregoing pleading by email and/or depositing same in the United States mail, postage prepaid, and addressed to the following:

Ms. Rayneika D. Hunter  
1206 Glenwood Drive  
Chattanooga, TN 37406

Mr. Jon-Isaac Malone  
4606 Linton Avenue  
Chattanooga, TN 37416

Alan Gold's Discotheque  
c/o Burton M Milligan  
Its Registered Agent  
1100 McCallie Avenue  
Chattanooga, TN 37404

This 24<sup>th</sup> day of October, 2024.

  
\_\_\_\_\_  
KATHRYN MCDONALD  
AZARIUS YANEZ

Office of the City Attorney  
100 E. 11th Street, Suite 200  
Chattanooga, TN 37402  
(423) 643-8250  
(423) 643-8255